

Harpreet S. Walia, Esq. (SBN 176136)  
Lisa M. Chapman, Esq. (SBN 118113)  
ROYSE LAW FIRM, PC  
1717 Embarcadero Road  
Palo Alto, California 94303  
Telephone: (650) 813-9700  
Facsimile: (650) 813-9777  
E-Mail: hwalia@rroyselaw.com  
lchapman@rroyselaw.com

Attorneys for Counterdefendants SANDEEP SOOD and  
MONSOON ENTERPRISES, INC. a California corporation

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NEXTDOOR.COM, INC., a Delaware  
corporation,

Plaintiff,

v.

RAJ ABHYANKER, an individual,

Defendant.

Case No.: 3:12-cv-05667-EMC

**DECLARATION OF SANDEEP SOOD IN  
SUPPORT OF COUNTERDEFENDANTS  
SANDEEP SOOD AND MONSOON  
ENTERPRISES, INC.'S MOTION IN  
OPPOSITION TO DEFENDANT AND  
COUNTERCLAIMANT RAJ ABHYANKER'S  
SUPPLEMENTAL BRIEF ATTACHING SOOD  
CONFIDENTIALITY AGREEMENT**

RAJ ABHYANKER, an individual,

Counterclaimant,

v.

NEXTDOOR.COM, INC., a Delaware  
corporation; PRAKASH JANAKIRAMAN, an  
individual; BENCHMARK CAPITAL  
PARTNERS, L.P., a Delaware limited  
partnership; BENCHMARK CAPITAL  
MANAGEMENT CO. LLC, a Delaware limited  
liability company; SANDEEP SOOD, an  
individual; MONSOON ENTERPRISES, INC.,  
a California corporation, and DOES 1-50,  
inclusive,

Counterdefendants.

Judge: Honorable Edward M. Chen

{00033725;4}

Case No.: 3:12-cv-05667-EMC

DECLARATION OF SANDEEP SOOD IN SUPPORT OF COUNTERDEFENDANTS SANDEEP SOOD AND MONSOON  
ENTERPRISES, INC.'S MOTION IN OPPOSITION TO DEFENDANT AND COUNTERCLAIMANT RAJ ABHYANKER'S  
SUPPLEMENTAL BRIEF ATTACHING SOOD CONFIDENTIALITY AGREEMENT

1 I, Sandeep Sood, declare:

2 1. I am the President of Monsoon Enterprises, Inc., which along with me has been named  
3 as a Counterdefendant in the above-captioned litigation. I have personal knowledge of each of the  
4 facts set forth herein, and would testify competently to the truth thereof if called as a witness.

5 2. I have reviewed Defendant and Counterclaimant Raj Abhyanker's Supplemental Brief  
6 Attaching Sood Confidentiality Agreement, Dkt. No. 165-1 (the "Supplemental Brief").

7 3. I did not execute electronically or by any other means that certain Independent  
8 Contractor Agreement or that certain Non-Disclosure Agreement attached as Exhibit A to the  
9 Supplemental Brief. At no point have I ever consented to be bound by either document presented in  
10 Exhibit A of the Supplemental Brief. I never gave another party authorization to type my name as an  
11 electronic signature thereto.

12 4. With regard to the transcript of an audio recording presented in Supplemental Brief  
13 Exhibit C: Without conceding the accuracy of such transcript, I believed the conversation to which  
14 such transcript pertains, to the extent such conversation actually occurred, to have been a confidential  
15 conversation. I did not understand Abhyanker to disclose that he was recording the conversation. I  
16 had no knowledge such conversation was being recorded and I never consented to same.

17 5. On the last page of the transcript referenced in paragraph 4, above, when I said  
18 "[c]orrect," I was referring to the only question Abhyanker had asked me, which was to confirm that I  
19 had not disclosed any sensitive information to one Prakash Janakiraman.

20  
21  
22 I declare under penalty of perjury that the foregoing is true and correct, executed on this 6th day of  
23 March, 2014, at Oakland, California.

24  
25  
26 By: 

27 Sandeep Sood  
28